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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 24, 1997

VIA HAND DELIVERY

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: CC Docket No. 96-45
Universal Service Support Distribution Options for Schools, Libraries and Rural
Health Care Providers

Dear Mr. Caton:

PCIA files this letter in response to the Commission's September 10, 1997 *Public Notice* requesting comments on, among other things, the report filed with the Commission on July 31, 1997 (the "Report") by the E-Rate Implementation Working Group (the "Working Group") regarding the administration of the Schools and Libraries Universal Service Fund.

PCIA previously submitted to the Commission suggestions for revisions to the forms proposed by the Working Group in its Report. *See* Letter from Angela E. Giancarlo, Esq. to William Caton, dated September 5, 1997. PCIA respectfully requests that the Commission incorporate those suggestions into the record of comments it will consider when implementing the Working Group's recommendations and establishing an application and distribution mechanism for the Schools and Libraries Universal Service Fund. For your convenience, I have attached a copy of that letter.

Should you have questions, kindly refer them to the undersigned.

Very truly yours,

Angela E. Giancarlo, Esq.
Manager, Industry Affairs

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FEDERAL COMMUNICATIONS COMMISSION
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VIA FEDERAL EXPRESS

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

RE: *In Re* Federal-State Joint Board on Universal Service (CC Docket No. 96-45)
Notice of Written Ex Parte Presentation

Dear Mr. Caton:

On September 3, 1997, the undersigned, of the Personal Communications Industry Association ("PCIA"), Christine Crowe, representing PCIA, and others met with Lisa Gelb and Irene Flannery of the Common Carrier Bureau and David Krech and Tejal Mehta of the Wireless Telecommunications Bureau. Also present via teleconference were Bridget Duff and Kevin Schwenzseier, representing the Florida and New York state utility commissions, respectively. A separate notification of *ex parte* presentation was filed yesterday with respect to that meeting.

As a follow-up to that meeting, PCIA hereby reiterates its request that the Commission incorporate certain changes to the application form (entitled "FCC Form I") proposed in the Report to the Federal Communications Commission by the E-Rate Implementation Working Group on July 31, 1997 (the "Report"). These changes will accommodate participation in the Schools and Libraries Fund by wireless service providers.

PCIA hereby places in the record its support of several revisions to the application form which were presented and reviewed at the above-referenced September 3 meeting. These revisions are as follows:

1. The categories of service which appear at pages 29-30 of the Report and are currently denominated as "Voice" and "Data/ LAN" should be revised so that the new denominations would read "Voice (including wireline and wireless services)" and "Data/LAN (including wireline and wireless services)."
2. The service categories listed on page 31 of the Report which currently read "Voice" and "Data" should be revised such that the new categories would read "Basic Telephone (including wireline and wireless services)" and "Data (including wireline and wireless services)." The other sub-categories currently reflected

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within the "Voice" category should be removed from the form.

3. In conjunction with the above-proposed changes to the application form, PCIA suggests that the instructions to the form contain a brief description of each type of wireless service which may satisfy the request for service contained within the form.
4. PCIA also agrees that references in the application form to "number of rooms/locations to be served" and "number of extension paths requested" be modified to include references to "number of units requested or needed to be served" in order to provide a method for wireless carriers to evaluate their ability to a service request.

Pursuant to Section 1.1206(b) of the Commission's rules, two copies of this letter are being filed with the secretary's office and a copy of this filing is being sent to the FCC staff members present during the meeting.

Kindly refer questions in connection with this matter to the undersigned.

Respectfully submitted,



Angela E. Giancarlo, Esq.
Industry Affairs Manager

cc: Lisa Gelb
Irene Flannery
David Krech
Tejal Mehta
Bridget Duff
Kevin Schwenzseier
Christine Crowe